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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
One Cessna Airplane, Model Number)
TU-206, bearing Tail Number N6214V)
and Serial Number U206-1189,)
)
and)
)
\$259,717 United States Currency,)
)
Defendant-Property.)
)
SCOTT MICHAEL LEWIS,)
)
Claimant.)

Civil No. 14-CV-00151-ABJ

UNITED STATES' RESPONSES TO CLAIMANT'S FIRST INTERROGATORIES

Pursuant to Fed. R. Civ. P. 36, Plaintiff hereby responds to Claimant's first Interrogatories.

Attachment E

INTERROGATORIES

The image is a high-contrast, black-and-white graphic. It features a large, dark, irregular shape on the left side, composed of a grid of black pixels. This shape has jagged edges and several vertical lines extending downwards from its top. The rest of the image is mostly white, with a few short, dark horizontal bars at the top and a small, dark, irregular shape at the bottom left.

A series of black horizontal bars of varying lengths and positions on a white background, suggesting a redacted document. The bars are arranged in a descending staircase pattern from top-left to bottom-right. The lengths of the bars decrease as they move from left to right and increase as they move from top to bottom. The bars are solid black and have sharp edges.

A large block of black redacted text, consisting of approximately 20 lines of text, rendered as a solid black rectangle. The redaction is irregular, with varying line lengths and some small white spaces visible at the boundaries of the redacted areas.

A series of horizontal black bars of varying lengths and positions, likely redacted text. The bars are arranged in a grid-like pattern, with some bars being significantly longer than others. Some bars are positioned near the top, while others are near the bottom. The lengths of the bars vary, with some being very short and others being very long. The positions of the bars also vary, with some being near the top, some in the middle, and some near the bottom. The overall effect is a series of horizontal black bars of varying lengths and positions, likely redacted text.

A series of horizontal black bars of varying lengths, likely representing redacted text or a visual representation of data. The bars are arranged vertically and vary in length, with some being relatively short and others being much longer, creating a pattern of horizontal lines across the page.

[REDACTED]

INTERROGATORY NO. 12: Please state each and every fact and/or contention which you claim to be true and which you claim supports your allegation that either Defendant property, or any part thereof, is forfeitable to the United States per 21 U.S.C. § 881(a)(6), in that it constitutes, or is traceable to, proceeds of an exchange for a controlled substance in violation of “Subchapter I, Chapter 13 of Title 2”, or any other law.

ANSWER: Objection. This Interrogatory is vague and overbroad, and includes information protected by the work-product doctrine. Without waiving any objection, this answer hereby incorporates the facts as presented in Dkts 1, 43-2, 45, and 55-1. Further, the following summary of additional facts also demonstrates the defendant property is subject to forfeiture:

On or about January 22, 2010, Scott Michael Lewis was discharged from the U.S. Air Force Academy for Honor Code violations and was ordered to repay \$108,974.00 to reimburse the United States Air Force Academy for costs of education. Scott Michael Lewis was ordered to complete 2 years of enlisted service in the United States Air Force pursuant to conditions of U.S. Air Force Academy appointment. Scott Michael Lewis was eventually discharged from the U.S. Air Force in 2011, having not completed his enlisted obligation, and as of March 3, 2015, had not repaid the debt he incurred at the Air Force Academy.

While pending assignment to an enlisted position, Scott Michael Lewis was arrested on August 22, 2010, outside the house located at [REDACTED], Eureka, California. A subsequent search revealed 185 pounds of marijuana and \$261,122 in cash in the home. That cash was heat sealed in plastic with writing on the packaging, and listed the amounts of cash per package. The cash was bundled in stacks, wherein the stacks were wrapped with \$20 and \$100 bills in a distinct manner. A photograph by Humboldt County, California Drug Task Force documents the cash, the packaging and the manner of wrapping the cash. An additional photograph shows a “PILOT’s” Handbook. A review of the police reports from that investigation reveal that it was common for individuals of the conspiracy to utilize fraudulent

identity documents and to use real people's names and addresses on the fraudulent identification documents. Additionally, individuals (including Lewis), used the fraudulent identification documents in an attempt to "backstop" the fraudulent identification documents by obtaining Costco membership cards in the false name and bearing the photograph of the individual using the false identity document. Additional backstopping was used by obtaining gym memberships in the false names and having the gym membership card in the possession of the person utilizing the fraudulent identity document. Scott Michael Lewis eventually pleaded guilty to a misdemeanor violation for the conduct described as having occurred on August 22, 2010.

On or about March 30, 2012, Scott Michael Lewis rented an aircraft hangar at DeKalb Municipal Airport near Chicago, Illinois. Scott Michael Lewis utilized the name Michael J. Jenkins when he rented the hanger and signed the rental agreement. Scott Michael Lewis paid for 6 months rental of the hanger (\$2401.50) with three unsigned Money Gram Money Orders. On April 17, 2012, HSI personnel from the Chicago, IL office conducted surveillance of Lewis leaving the hanger. A traffic stop of Lewis was made by a police officer for a minor traffic violation. Lewis and another person provided identity documents to establish their true identities, including Lewis's Colorado driver's license, license number 10-169-0902, bearing a photograph that represented the person stopped by the police. This aircraft hangar was never used by Lewis or anyone else while it was rented to Lewis.

In June 2013, Lewis and Gilbert Wiles Jr. took the subject Cessna 206, N-6038V to Straight Flight Aviation in Centennial, Colorado for repairs/upgrades. Lewis used the name Steve LNU and Wiles used the name Karl Stassney when dealing with Straight Flight company employees. Wiles and Lewis claimed to be working for Digital Aerial. Wiles gave Straight Flight an email address of Karl@digitalaerial.com for contact purposes. Investigation revealed that Digital Aerial Imaging Solutions is a real company and interviews of principal owners/management of Digital Aerial Imaging Solutions revealed the neither Lewis, aka Steve LNU nor Wiles, aka Karl Stassney were ever employees of that company, and the company never assigned an email address of Karl@digitalaerial.com to either Lewis or Wiles. Wiles

paid for the repairs utilizing Money Gram money orders. Straight Flight employees considered this to be very unusual as most customers do not use cash or money orders to pay for repairs. Straight Flight personnel described Wiles as the “money guy” and that Lewis, aka Steve LNU, was the chief pilot for the company.

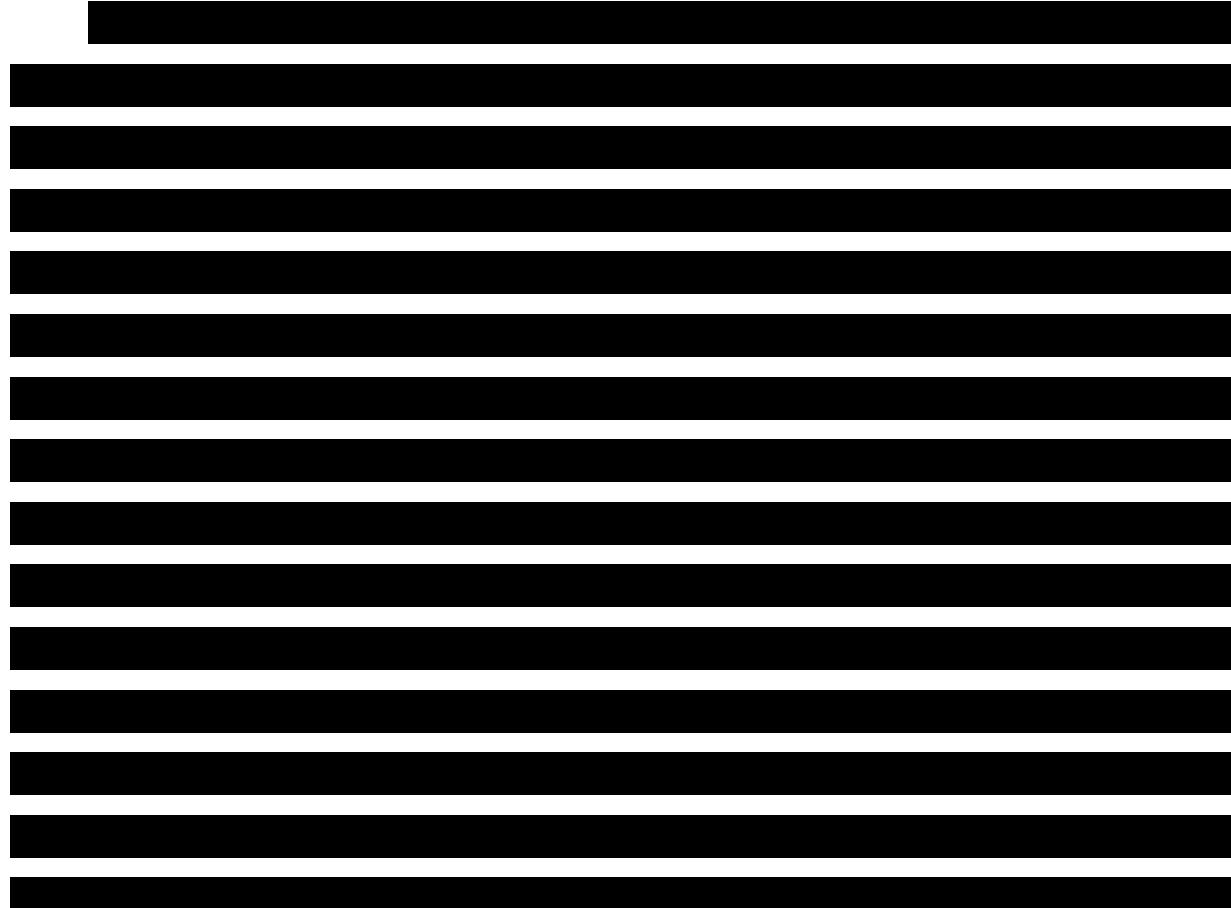
On or before October 21, 2013, Jason Hurd, owner of Vector Air in Erie, CO took an order for a Short Takeoff and Landing (STOL) kit for individuals who claimed to work for Digital Aerial, 50 Clarkson Street, Denver, Colorado. A STOL kit is indicative of illegal drug smuggling activities because it facilitates use of remote and clandestine landing strips. Mr. Hurd positively identified Wiles as one of three people that had been to his shop to order the STOL kit. Mr. Hurd believes, but is not positive, based on a photographic lineup, that Lewis was present as well. Mr. Hurd stated that Wiles paid \$2200 for the STOL kit and an additional \$500 for oil, in cash.

On another Straight Flight invoice dated October 21, 2013, Lewis and Wiles took the Cessna 206, N-6038V to Straight Flight for repairs/upgrades, including the installation of the STOL kit purchased from Vector Air. Lewis used the name Steve LNU and Wiles used the name Karl Stassney when dealing with Straight Flight company employees. Straight Flight was given the name of the responsible company for the cost of repairs as Aerial Imaging, 1843 Commerce Drive, Suite B, South Bend, Indiana as the responsible party. Investigation revealed that Williams Aerial and Mapping, Inc. is a real company, with an address of 1843 Commerce Drive, Suite B, South Bend, Indiana. An interview of principal owners/management of Williams Aerial and Mapping, Inc. revealed the neither Lewis nor Wiles was ever an employee of that company. The work done by Straight Flight was invoiced at \$12,332.15 and Lewis and Wiles paid for the repairs utilizing \$5000 in cash, and the remainder in multiple Money Gram money orders, over multiple time periods.

Straight Flight personnel stated that everything about dealing with Wiles and Lewis was odd, from the payment in cash and money orders, the opaque ownership of the aircraft with Skydive Inc. still being the registered owner with the FAA and a bill of sale showing ownership being transferred to Morris Point, LLC, yet two different aerial imaging companies

being responsible parties for repair costs, to the fact that after the work was completed, neither Lewis or Wiles seemed interested in getting the logbook back from Straight Flight with the repair annotations made in the log book.

On or about January 9, 2014, a confidential informant (CI), stated that he/she had intimate knowledge of Scott Michael Lewis, who the CI knew as Scooter. The CI stated that persons known to him/her and Lewis were all jailed together in California as a result of the August 2010 incident in Eureka, California. The CI knew that Lewis, aka: "Scooter", was an ex-Air Force pilot who smuggled marijuana for a drug trafficking organization from California to Iowa and Illinois and smuggled the cash proceeds of the marijuana back to California in an aircraft. The CI knew this intimate information as he/she was an active member of the same drug trafficking organization as was "Scooter", aka Scott Michael Lewis. The CI stated that "Scooter" was still an active member of the drug trafficking organization as of the date of the debrief.



A series of horizontal black bars of varying lengths, likely representing redacted text or a visual effect. The bars are arranged vertically and vary in length, with some being shorter and others being longer, creating a pattern of horizontal lines.

HSI also conducted a financial evaluation of both Lewis and Wiles. As part of those financial evaluations, HSI contacted the Colorado Department of Employment and requested

Wage Reports filed for unemployment benefit purposes and learned that Wiles did not have any reported earnings for the time frame of 3 years prior to his arrest in Cody, WY on February 28, 2014 and obtained wage reports for Lewis for the same time frame. Lewis had reported earnings totaling \$17,212.75 from 3rd quarter 2010 until his arrest on February 28, 2014 was employed on a sporadic basis by Towne Park, Limited, a valet parking company. There were no other reported earnings.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

See also facts as detailed in the documents identified in the responses to RFP Nos. 1 & 7. Discovery is ongoing, and the United States reserves the right to supplement this answer as necessary.

[REDACTED]

A large number of black horizontal bars of varying lengths are arranged in a grid-like pattern. The bars are of different widths and are positioned at different vertical intervals. Some bars are longer and span multiple rows, while others are shorter and appear in pairs or groups. The overall effect is a decorative or abstract pattern of horizontal lines.

A large black rectangular redaction box covers the majority of the page content, starting below the header and ending above the footer. The redaction is composed of several horizontal black bars of varying lengths, with a larger central bar and smaller bars on the left and right sides.

As to Objections:

Dated this 31st day of August, 2016.

CHRISTOPHER A. CROFTS
United States Attorney

By: /s/ C. Levi Martin
C. Levi Martin
Assistant United States Attorney

CERTIFICATE OF SERVICE

It is hereby certified on the 31st day of August, 2016, a true and correct copy of the foregoing **UNITED STATES' RESPONSES TO CLAIMANT'S FIRST INTERROGATORIES** were served upon the following by the method(s) indicated below.

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/s/ Breanne Ramirez

United States Attorney's Office

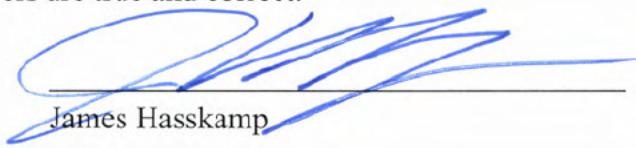
VERIFICATION

STATE OF *Wyoming*

ss.

COUNTY OF *Laramie*

Before me, the undersigned authority, on this day personally appeared **James Hasskamp**, who being first duly sworn, stated that he has personal knowledge of the facts stated in the foregoing **UNITED STATES' RESPONSES TO CLAIMANT'S FIRST INTERROGATORIES** and that all of the answers are true and correct.



James Hasskamp

Subscribed and sworn before me this 1st day of September, 2016.

Witness my hand and official seal.



My commission expires: *1/7/17*



Breanne Ramirez
NOTARY PUBLIC